

FORD OTOMOTİV SANAYİ A.Ş. DISCLOSURE POLICY

1. OBJECTIVE AND SCOPE

The Disclosure Policy (“Policy”) of Ford Otomotiv Sanayi A.Ş. (“Ford Otosan” or the “Company”) lays out the procedures and principles to disclose material information, which is not classified as trade secrets, in compliance with applicable regulations and in response to stakeholder expectations accurately, fully, directly, clearly and adequately in an easily accessible and timely manner by observing the principle of equity. In this context, material information may include Ford Otosan’s past and current financial and operational performance, forward looking statements, and developments, which may all affect the capital market instruments’ prices and subsequently investor decisions.

Ford Otosan actively follows and implements a transparent disclosure policy in line with its Code of Conduct and Ethical Rules and complies with all applicable legislation, including Turkish Commercial Code (TCC), Capital Markets Board of Turkey (CMB), and Borsa İstanbul A.Ş. (BIST) regarding public disclosure.

2. METHODS AND TOOLS

2.1. Authorized Spokespersons

In principle, all announcements and statements about Ford Otosan in line with the objective and scope specified above should be made by the Company Spokespersons, which include Board members, Ford Otosan Leaders , Leaders reporting directly to Ford Otosan Leaders , Investor Relations Leader, and Corporate Communications Leader. If needed, these spokespersons may occasionally designate other employees to speak on behalf of the Company or to answer the specific inquiries from the investors or the media.

The Investor Relations Leadership, consisting of the relevant Finance and Accounting Leadership, Investor Relations Leader and Investor Relations Specialist reporting to the Finance and Accounting Leader-CFO, may speak on behalf of the Company to promote Ford Otosan to existing and potential local and international investors, investment institutions, and financial institutions, to provide information to analysts working for such organizations and financial institutions, and answer questions related to investor relations.

The Investor Relations Leadership is tasked with organizing, scheduling, and developing communications and presentations aimed at investors and analysts, and the Corporate Communications Leadership for the media. Only the Ford Otosan Leaders, Finance and Accounting Leader – CFO and the Investor Relations Leadership are authorized to disclose information to the investors and analysts.

2.2. Disclosure Methods and Tools

Pursuant to the applicable provisions of TCC and the CMB and BIST regulations, and in line with this Disclosure Policy, Ford Otosan uses the following methods and tools for public disclosure:

- Material event disclosures and the Company’s general information form published on the Public Disclosure Platform
- Financial statements, independent auditor’s reports, and annual reports published on PDP

- Corporate Governance Compliance Report and Corporate Governance Information Document published on PDP
- Company applications on the corporate website (www.fordotosan.com.tr) and digital platforms
- Promotional materials and company presentations for investors and analysts
- Meetings with investors and analysts, briefings and meetings, including those on digital platforms, to inform capital market players
- Registration statements, circulars, capital market instrument issuance announcements, disclosures and other documents required by Capital Markets Board regulations
- Press statements in print, visual, and digital media
- Media interviews and press conferences
- Central Registry Agency’s (CRA) e-Company and e-General Assembly platforms
- Advertisements and announcements in the Turkish Trade Registry Gazette and, if needed, in daily newspapers

Depending on the nature of the disclosure, one or more of these methods and tools can be used.

2.3. Investor Relations Leadership’s Activities

The Investor Relations Leadership at Ford Otosan carries out activities to maintain regular contact with current and potential investors, analysts, and capital market experts, effectively respond to the questions of investors and other capital market players, and provide necessary information to ensure that the Company’s capital market instruments traded in the financial markets are priced fairly. Investor Relations Leadership manages communications with shareholders and other stakeholders to avoid asymmetrical dissemination of information and ensure that it is easily accessible, comprehensible, analyzable, timely and accurate.

The priority objective of the Investor Relations Leadership is to ensure effective, two-way communication between the Company and the investors. Accordingly, the Investor Relations Leadership functions as a bridge between the Company’s senior management and investors. In addition to communicating the Company’s investment messages to the investors, the leadership also submits periodic reports to convey the assessments and feedback from the investors to the senior management, thus ensuring two-way communication.

The Investor Relations Leadership aims to inform the investors and analysts adequately using the methods and tools mentioned above. For this purpose, the leadership prepares, publishes and updates all these tools in accordance with the legislation.

Briefings

Ford Otosan’s Finance and Accounting Leader – CFO and Investor Relations Leadership frequently meet capital market players such as brokerage firms, analysts, and investors to ensure that Ford Otosan’s operational and financial performance, vision, strategy and goals and the added value it creates for its shareholders are communicated and promoted to interested investors and analysts.

In addition to accommodating as many meeting requests as possible throughout the year, the Investor Relations Leadership also attends face-to-face and online conferences and meetings in Turkey and abroad. The Leadership also hosts one-on-one briefings with investors. Ford Otosan Leaders, Finance and Accounting Leader – CFO and other executives occasionally attend these meetings, improving the effectiveness of the communications between the senior management and the existing and potential investors.

To ensure effective financial communication with current and potential investors, quarterly financial results are presented at briefings and teleconferences, which the Investor Relations Leader, Finance and Accounting Leader – CFO, and Ford Otosan Leader sometimes attend, to inform the investors and analysts and answer their questions. The teleconferences are held with wide participation via the internet broadcast method, and the entire meeting records, including the presentation and question-answer parts, is published on the website.

The dates of the local and international conferences and roadshows that Ford Otosan plans to attend are publicly disclosed on Ford Otosan’s corporate website (www.fordotosan.com.tr) to keep the investors informed. The website is updated at regular intervals to ensure that the investors and analysts follow the latest developments in the Company and the automotive industry.

The Company applies a “Quiet Period” to prevent the asymmetric distribution of information and public disclosure before specific information is confirmed. The Quiet Period starts two weeks before the quarterly earnings releases and annual financial reports are announced and ends with the public disclosure of the related financial statements.

When the date of a quarterly earnings release is set before the end of the relevant quarter, a material event disclosure regarding the financial calendar is published and the disclosure date is also announced via the Investor Calendar on the corporate website. Such a disclosure includes information about the dates when a Quiet Period will be in place.

During the Quiet Period, no information about the financial position of the Company, except for the already publicly available information, will be shared. Meeting requests of the analysts, investors and other capital market players regarding the financial situation will not be accepted and their questions on these issues will not be answered. Without prejudice to the applicable CMB regulations, the Quiet Period will not prevent the Company’s spokespersons from participating in conferences, forums and panel sessions, giving speeches or making statements provided that they do not contain financial guidance.

Information Documents

The Investor Relations Leadership aims to inform the investors through presentations, financial result announcements, annual reports, meetings and teleconferences with investors and analysts, website, company applications on the digital platforms etc., ensuring that all of these tools are prepared, published and updated in accordance with the legislation.

By regularly updating the corporate website and the information documents made available for the investors on the website, the Leadership enables the capital market players to closely follow the latest developments at Ford Otosan and access investor relations tools. The content of annual reports and websites are explained in the following sections.

The list and contact details of the analysts following Ford Otosan are made available for the investors in the Investor Relations section of the Ford Otosan corporate website. Ford Otosan is not authorized or obligated to review, verify or approve the analyst reports or models.

Information Requests

The Investor Relations Leadership responds to all kinds of questions, complaints, opinions and suggestions regarding the publicly disclosed information in line with this Policy or an evaluation of such information, directed via tools like telephone or email for the purposes of ensuring that the

shareholders, investors, analysts and other capital market stakeholders may effectively exercise their right to information as quickly as possible. The Leadership also makes sure that the information provided in the “Investor Relations” section of Ford Otosan’s corporate website is disclosed on time and kept up-to-date.

Website

The “Investor Relations” section of Ford Otosan’s corporate website is dedicated to providing financial and non-financial information that current and potential investors and analysts may need when valuing the Company’s capital market instruments or monitoring Ford Otosan’s performance, and is actively used for public disclosure. Most of the information on the website is available in both Turkish and English and is regularly updated.

The Corporate Communications Leadership is responsible for coordinating the preparation of the Ford Otosan website. The Company aims to use the corporate website (www.fordotosan.com.tr) as a tool that will most efficiently disseminate information. The content of the website is prepared in a way to provide a range of information that all stakeholders will find useful.

The Investor Relations Leadership is responsible for and tasked with determining and managing the content of the Investor Relations section of the corporate website. This section functions as a platform where detailed and comprehensive information is provided to enable the investors and analysts to value the company and view its performance and capital market instruments. Annual reports, financial statements and footnotes, and quarterly financial earnings announcements; information such as quarterly or monthly export revenues, monthly production volume, export and retail sales figures, and market shares, submitted to organizations like Romania Automotive Manufacturers Association (ACAROM), Turkiye Automotive Manufacturers Association (OSD), Automotive Distributors and Mobility Association (ODMD), and Turkiye Heavy Commercial Vehicles Association (TAID); investor presentations and financial results briefing presentations, which provide details such as performance of the domestic and export markets, and stock performance; material event disclosures, general assembly documents, corporate governance documents, etc. are available under this section mostly in both Turkish and English.

In addition to the information and documents made available in accordance with TCC, Corporate Governance Principles, and Investor Relations and Information Society Services, the website also features Ford Otosan’s policies and procedures such as “Dividend Policy,” “Disclosure Policy,” “Remuneration Policy” and “Ford Otosan Code of Conduct and Ethical Rules”, analyses and assessments, current and historical information and statistics. In addition, the information that Ford Otosan submits to organizations such as ACAROM, OSD, ODMD, and TAID is also published on the corporate website to advise all stakeholders concurrently.

3. DISCLOSURE POLICIES

3.1 Responsibility

The Finance and Accounting Leader – CFO and their team are authorized and tasked with fulfilling this obligation and coordinating with the relevant units, especially the Legal and Compliance Leadership as needed.

In principle, material disclosures are published in Turkish and English on the Public Disclosure Platform (PDP) signed with two of the three electronic certificates of the Finance and Accounting

Leader – CFO, Finance Leader, or the Management and General Accounting Leader, and also on the corporate website.

3.2 Individuals with Administrative Responsibility

The list of individuals with administrative responsibility is composed of Ford Otosan’s Board members and other people with regular direct or indirect access to the Company’s insider information and the authority to make administrative decisions on the Company’s future development and commercial objectives. Individuals with regular access to insider information and the authority to make administrative decisions are Ford Otosan Board members, Ford Otosan Leaders and Leaders reporting directly to Ford Otosan Leaders and executives of the main shareholder Koç Holding A.Ş. (Board Members, CEO, relevant Group Presidents, Directors, Head of Legal and Compliance, and the General Secretary). Information regarding the individuals with administrative responsibility is kept up-to-date on the corporate website under the Board of Directors and Senior Management sections.

3.3. Public Disclosure of Insider Information

Ford Otosan immediately publishes a material event disclosure on PDP in all cases specified in the capital market legislation and applicable laws and regulations when a materially significant change occurs or becomes known in the activities, financial structures and management/capital relations of Ford Otosan and its non-public subsidiaries, except for when the public disclosure is postponed. Except for when required by law, public disclosure should not contain information that may impact Ford Otosan’s competitiveness and result in harming the interests of shareholders and other stakeholders. Information qualified as trade secrets is not disclosed.

Once the material event disclosure is published on PDP by the Investor Relations Leadership and the Corporate Communications Leadership, a statement can be released about the subject matter.

3.4. Protecting Insider Information

Ford Otosan employees who are in a position to have insider information and other parties in contact with such employees are informed in writing or in electronic medium that they are liable to protect insider information between the time the information subject to a material disclosure develops until it is announced on PDP.

As a general principle, Ford Otosan employees and persons who work in the name and on account of the Company will not, by any means, share information that is not publicly available and that may qualify for a material disclosure, with third parties. If it is determined that insider information has been unintentionally shared by these people with the third parties, and if it is concluded that the confidentiality of the information cannot be protected, then a Material Disclosure is issued in accordance with CMB regulations.

If public disclosure of such information is postponed, persons with access to the subject information at the time of postponement are informed about their obligations and sanctions applicable thereof.

The agreements signed with parties that have access to the postponed insider information other than the Ford Otosan employees and persons who work in the name and on account of the Company include a confidentiality provision to ensure that they take the necessary measures to maintain the confidentiality of such information.

3.5. Postponing Public Disclosure of Insider Information

Ford Otosan, at its own discretion, may postpone the public disclosure of insider information not to harm its legitimate interests, provided that such postponement does not mislead investors and confidentiality can be guaranteed. In such cases, Ford Otosan will take all possible measures to ensure the confidentiality of insider information in accordance with capital markets legislation. When the Board of Directors does not reach a resolution regarding the transaction subject to postponement and postponing disclosure, Ford Otosan Leaders, authorized by Ford Otosan's Board of Directors will decide whether to postpone such disclosure by consulting with the Finance and Accounting Leader – CFO, Legal and Compliance Leader, and other relevant Leaders reporting directly to Ford Otosan Leaders.

3.6. Verification Obligation

Ford Otosan follows the news coverage and content about the Company in the national mainstream media, digital channels and social media platforms through the contracted local media tracking agency. The Corporate Communications Leadership reports such news coverage to the Company's senior management and the Investor Relations Leadership every day. In addition, the news coverage about the Company is followed on the subscribed data publishing channel.

In the event that news stories, rumors, or information different from the already publicly disclosed information about Ford Otosan appear in the press or any other forms of media for the first time that may materially influence the investment decisions or affect the price of the capital market instruments, and if a material disclosure is deemed necessary in consideration of the principles below, a statement is released to confirm whether these are true or sufficient. Comments, analyses, evaluations and forecasts about Ford Otosan based on publicly disclosed information are excluded.

As part of the verification obligation, the circulation or popularity of the media outlet is taken into account when assessing the need to publish a material event disclosure.

As a general policy, Ford Otosan considers the following principles in fulfilling its verification obligation:

- If the news coverage is not materially significant in terms of qualifying as insider information, no statement is released as a general principle. However, the Corporate Communications Leadership will assess whether there would be any value in releasing a statement on a topic that does not require publishing a material event disclosure per CMB regulations.
- If a material event disclosure or any other means of disclosure is already published in accordance with CMB regulations about a news story that qualifies as insider information, no further action is taken.
- In principle, Ford Otosan does not comment on news stories about insider information whose disclosure is postponed or topics that are not on the agenda. The Company does not respond to questions from the media on these topics or react to news stories that clearly seem to be gossips, rumors and baseless.
- However, if deemed necessary, Ford Otosan may decide to publish a material event disclosure about certain unfounded news stories that contain significant errors, mistakes or omissions that may materially influence investment decisions or the price of the capital market instruments.
- If a news story covered in the media is about insider information whose disclosure is postponed:

- If the news story contains accurate and material information that may influence investment decisions, the grounds for postponing the announcement is no longer valid and a material event disclosure is published immediately by limiting the announcement to the specific information.
- If the news story contains material errors, mistakes or omissions, the insider information is still deemed to be protected, and therefore a material event disclosure may not be required.
- However, if deemed necessary to protect the interest of the shareholders and the company, Ford Otosan may decide to publish a material event disclosure about unfounded news stories or topics that would benefit from an announcement.
- Independently from a material event disclosure, the Corporate Communications Leadership may issue a press release on such news coverage or inform the media and the public via Ford Otosan's corporate social media accounts, if deemed necessary.

3.7. Forward-Looking Statements

Forward-looking statements include, but are not limited to, Turkish automotive industry sales figures, Ford Otosan's domestic, export and wholesale volumes, production quantities, investment spending, revenues, profitability, and such financial information.

Ford Otosan may issue forward-looking statements within the framework of the principles specified in the capital markets legislation. Ford Otosan releases forward-looking statements based on the following principles:

- In accordance with applicable laws and regulations, and as a general principle, forward-looking statements along with their key underlying assumptions will be released maximum four times in a year, following the interim reports as part of the quarterly annual reports and financial results.
- Once the forward-looking statement is published on PDP and the corporate website via the investor presentations and/or the quarterly interim reports or announced in a Material Event Disclosure (MED), when needed, the relevant MED, annual report, quarterly earnings announcement, investor presentation of the relevant period, and the quarterly financial results briefing presentation are published on the corporate website.
- Forward-looking statements will clearly specify that significant discrepancies may arise between the stated expectations and the actual results due to potential risks and uncertainties.
- When the publicly disclosed forward-looking statements change materially, in other words the expectations and assumptions stated in the forward-looking statements disclosed to the public are not actualized or turn out to be impossible to be actualized, the revised expectations are announced to the public through material event disclosures without any limitation to the number of disclosures.
- When material discrepancies arise between the previously disclosed expectations and the actualizations, the forward-looking statements are updated where they were disclosed and the reasons for the discrepancies are also explained.

4. OTHER PUBLIC DISCLOSURE POLICIES

4.1. Announcements Regarding Exercise of Shareholders' Rights

Pursuant to the applicable provisions of the Turkish Commercial Code, Capital Markets regulations, and Ford Otosan Articles of Incorporation, shareholders are provided information about the general assembly meetings, capital increases, dividend payments, mergers and

demergers through relevant documentation and announcements published on PDP within the allowed timeframes.

Such documentation is made available both on the required legal platforms and also on Ford Otosan's corporate website to facilitate the investors' access.

4.2. Public Disclosure of Financial Statements

Ford Otosan's financial statements are prepared in accordance with the Turkish Financial Reporting Standards within the scope of Capital Market Board regulations and publicly disclosed in quarterly periods announced by CMB. Annual financial statements are fully audited, and semi-annual financial statements are audited in limited scope by an independent audit firm. Ford Otosan's financial statements and footnotes, published in Turkish and English, can be found on the corporate website, where previous versions are also available.

Before the financial statements and footnotes are disclosed to the public, they are submitted to the Board of Directors for approval with the consent of the Audit Committee in line with the CMB regulations. After the declaration of responsibility is signed, the financial statements, footnotes and independent audit report, if available, are published on the Public Disclosure Platform. The financial statements and their annexes published on PDP are also posted on the corporate website.

In addition to the information disclosed in the financial statements, additional information such as the company's financial ratios and foreign currency position may be disclosed in the annual report, investor presentation, analyst presentation and financial result announcements prepared for each financial statement period, so that investors and analysts can perform the necessary analyses.

4.3. Public Disclosure of Annual Reports

Ford Otosan prepares annual reports for the same periods as its financial statements and publicly discloses them in accordance with the procedures specified by the CMB. The content of the Annual Report is created in accordance with global standards, provisions of TCC and CMB Regulations, and CMB's Corporate Governance Principles. The design and content of the Annual Report is prepared by the Investor Relations Leadership in accordance with the legislation and global best practices and submitted to the Board of Directors for approval with the consent of the Audit Committee and duly disclosed to the public with the approval of the Board of Directors.

While the annual report is, in principle, disclosed to the public together with Ford Otosan's financial statements, simultaneous release may not always be possible since the annual report is also printed. In such cases, the annual report is publicly disclosed after the financial statements, but in any event, at least three weeks before the ordinary general assembly meeting and within the legal periods specified in the CMB regulations by publishing it on the PDP and Ford Otosan's website together with the statement of responsibility.

The annual report, available on the website in Turkish and English, is printed in sufficient number to be distributed to shareholders, institutions and individuals who may request the report in hard copy from the Investor Relations Leadership.

Quarterly interim reports are also disclosed to the public through the Public Disclosure Platform (PDP) and provided on the corporate website in Turkish for the investors to review.

5. AUTHORITY AND RESPONSIBILITY

The Board of Directors is responsible for forming, implementing, reviewing, updating as needed, and disclosing the Disclosure Policy in accordance with applicable legislation, starting with the provisions of TCC, CMB, and BIST regulations.

The Disclosure Policy, approved by the Board of Directors, is published in Turkish and English on the PDP and the corporate website. If the Disclosure Policy needs to be revised, the Investor Relations Leadership will update the Policy and submit it to the Board of Directors for approval. After approval by the Board of Directors, the new version of the Policy is published on PDP and the corporate website.

While the Ford Otosan Board of Directors has the authority regarding the Disclosure Policy, Finance and Accounting Leader – CFO and their team and/or Corporate Communications Leadership are responsible for executing and ensuring the implementation of the principles and procedures set forth in this Policy.

Investors and/or stakeholders can communicate their questions, complaints, opinions and suggestions regarding Ford Otosan’s Disclosure Policy to the Investor Relations Leadership.

6. APPROVALS AND REVISIONS

This Policy was approved by the Ford Otosan Board of Directors’ resolution no. 2023/21 on 15.06.2023. This Policy replaces the previously disclosed Policies listed below, which will become null and void on the date this Policy enters into force.

Board of Directors’ Resolution Approving the Policy		Policy Publishing Date on PDP
Date	Number	
30.04.2009	18	04.05.2009
29.04.2015	15	29.04.2015